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April 10, 2024

**VIA ECF**

The Honorable Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Saunders v. Breda, Inc.*, Case No. 1:23-cv-10690-MMG-SLC

Dear Judge Cave:

We represent defendant Breda, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from April 10, 2024 to May 28, 2024. Accordingly, we also request that the Court adjourn *sine die* the Initial Case Management Conference scheduled for April 15, 2024 at 11:00 a.m. (Dkt #16).

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, voluntary dismissal will be filed.

Respectfully submitted,

/s/ Rebecca A. Stark  
Rebecca A. Stark

cc: All counsel of record (by ECF)